

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Richard O'Neill v. Aurobindo Pharma
USA, Inc., et. al.*

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF, RICHARD O'NEILL**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, filed November 17, 2020 – Document 632), Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC will take the deposition upon oral examination of Plaintiff, Richard O'Neill, on November 29, 2021 at 1:00 p.m., EDT. Please take further notice that: the deposition will be conducted completely remote, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Jill H. Fertel
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Date: November 23, 2021

Respectfully submitted,

s/ Jill H. Fertel
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*Attorney for Defendants
Aurobindo Pharma USA, Inc.,
Aurobindo Pharma Ltd., and
Aurolife Pharma LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of November, 2021, I caused a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Richard O'Neill to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was served on Plaintiff's counsel by e-mail, with a copy served on all parties via MDL Centrality, on November 23, 2021.

This 23rd day of November, 2021.

/s/ Jill H. Fertel
Jill H. Fertel